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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ECN Financial LLC

Plaintiff,

v.

Galmor's G&G Steam Services, Inc.

And Steven Galmor

Defendants,

v.

Total Equipment and Rental, LLC d/b/a

Bobcat of Oklahoma City,

Additional Defendant

Civil Action

No. 17-cv-2760 (CDJ)

RULE 26 INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a), PNC Equipment Finance, LLC successor and assignee to ECN Financial LLC (hereinafter "PNC") through its undersigned counsel respectfully submits the following report and makes the following disclosures as follows:

A. Names of persons likely to have discoverable information that Plaintiff may use to support its claims or defenses, other than impeachment witnesses:

a. Individuals Associated with Plaintiff

- 1) Justin Vento
Portfolio Manager, Service Center
PNC Equipment Finance, LLC
655 Business Center Drive, Suite 250
Horsham, PA 19044
Phone 267.960.4000

Mr. Miller is a portfolio manager at PNC Equipment Finance, LLC and has knowledge regarding Plaintiff's loan file and its failure to pay PNC.

2) Lauren Rex
Collections Manager
PNC Equipment Finance, LLC
655 Business Center Drive, Suite 250
Horsham, PA 19044
Phone 267.960.4000

Ms. Rex is a collections manager at PNC and has knowledge regarding Plaintiff's loan file and its failure to pay PNC.

3) J. Eric "Rick" Atherholt
Chief Counsel
PNC Equipment Finance, LLC
655 Business Center Drive, Suite 250
Horsham, PA 19044
Phone 267.960.4000

Mr. Atherholt has knowledge of the documentation for the loan.

4) Dennis Johnson
Vice President—Legal Services
PNC Equipment Finance, LLC
655 Business Center Drive, Suite 250
Horsham, PA 19044
Phone 267.960.4000

Mr. Johnson has knowledge regarding Plaintiff's loan file and its failure to pay PNC.

5) David Kovacs
Senior Vice President
PNC Equipment Finance, LLC
655 Business Center Drive, Suite 250
Horsham, PA 19044
Phone 267.960.4000

Mr. Kovacs has knowledge regarding Plaintiff's loan file and its failure to pay PNC.

6) Ted Arnow
Director of Credit
PNC Equipment Finance, LLC

655 Business Center Drive, Suite 250
Horsham, PA 19044
Phone 267.960.4000

Mr. Arnow has knowledge of the execution of the loan transaction.

7) Greg Garrison
Director, Asset Management
PNC Equipment Finance, LLC
655 Business Center Drive, Suite 250
Horsham, PA 19044
Phone 267.960.4000

Mr. Garrison has knowledge of the collateral securing the promissory note.

b. Individuals Associated with Defendants

1) Steve Galmor, President
Galmor's G&G Steam Services, Inc.
120 West 12th Street
Elk City, OK 73644

Mr. Galmor has information relating to the execution of the financing agreements.

2) Deena Carter, Secretary
Galmor's G&G Steam Services, Inc.
120 West 12th Street
Elk City, OK 73644

Ms. Carter has information relating to the execution of the financing agreements.

3) Levy Galmor, Vice President
Galmor's G&G Steam Services, Inc.
120 West 12th Street
Elk City, OK 73644

Mr. Galmor has information relating to the payments made to PNC under the financing agreements.

5) Justin Galmor, Vice President
Galmor's G&G Steam Services, Inc.
120 West 12th Street
Elk City, OK 73644

Mr. Galmor has information relating to the payments made to PNC under the financing agreements.

c. Individuals Associated with Third Parties

- 1) Sal Diaz, Jr., Branch Manager
Total Equipment and Rental, LLC d/b/a Bobcat of Oklahoma City
8800 North I-35 Service Road
Oklahoma City, OK 73131

B. Documents and other things having a bearing on the claims defenses and are in the possession of Plaintiff:

PNC has initiated the process of evaluating the existence of relevant documents, and reserves the right to supplement, amend or update this list. PNC has (1) one promissory note between Element Financial and Galmor's G&G Steam Services, Inc.; (2) authorizations to disburse funds; (3) personal guarantees for Defendant Steve Galmor; (4) funding worksheet for the leases and related equipment; (5) a payment history report; (6) corporate registration and credit history information; (7) schedules listing the equipment subject to the leases; and (8) correspondence between Defendant Galmor and PNC.

C. Damages Calculation:

Element Financial alleges under the terms of the financing agreement that a total of \$268,805.00 in principal is now due and owing plus costs and interest.

D. Insurance:

Plaintiff PNC Equipment Finance, LLC at this time, is not aware of any insurance agreement under which any persons carrying on an insurance business may be liable to satisfy all or part of a judgment that may be entered in favor of Plaintiff or to indemnify or reimburse Defendant for payments to satisfy any judgment.

/s/Matthew A. Foley

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Dated: July 24, 2017